



April 2008

**Submission from the Dietitians Association of Australia  
A588 Voluntary Addition of Fluoride to Packaged Water**

The Dietitians Association of Australia (DAA) is the national association of the dietetic profession with over 3500 members, and branches in each State and Territory. DAA is a leader in nutrition and advocates for better food, better health, and better living for all.

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DAA appreciates the opportunity to comment on the Application A588: Voluntary Addition of Fluoride to Packaged Water.

**DAA supports the amendment of Standard 1.3.2 to permit the voluntary addition of fluoride to packaged water up to a maximum claimable amount of 1.0mg/L, rather than 1.5mg/L as proposed in Option 2 of the initial assessment report.**

DAA understands that the Australian Drinking Water Guidelines (ADWG) set 1.0mg/L as a target and that all Australian jurisdictions have fluoridated water supplies at, or below, 1.0mg/L. Given that this Application is being assessed on the basis of nutritional equivalence DAA believes the ADWG target levels should guide the maximum claimable amount in Standard 1.3.2., rather than the 1.5mg/L maximum level set in the ADWG.

DAA agrees that a restricted dietary intake assessment by FSANZ at Draft Assessment will be important to estimate if any population groups, including high consumers in hot climates or infants fed infant formula reconstituted with fluoridated packaged water is likely to exceed the UL for fluoride if they consume only packaged water with added fluoride.

DAA supports the specification of 'packaged water' in the Australia New Zealand Food Standards code, consistent with Codex Alimentarius, to specifically exclude sugars, intense or artificial sweeteners, flavourings or other foodstuffs.

DAA believes that packaged fluoridated water should have a pH between 6.5 – 8.5 as specified in the ADWG. Many carbonated waters have a lower pH, are not nutritionally equivalent to those with a pH in the range of 6.5 – 8.5 and are detrimental to oral health. Consequently DAA recommends that carbonated water be excluded from the Standard.

DAA supports the labelling of packaged water with fluoride to the same level permitted in tap water which provides adequate information to enable consumers to make informed choices i.e. consumers should not be misled into thinking that fluoridated packaged water is better than tap water.